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FELLOW, AMERICAN COLLEGE OF TRIAL LAWYERS

July 1, 2020

VIA ECF

Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Sajmir Alimehmeti
16 Cr. 398 (PAE)

Dear Judge Engelmayer:

We write to request an addition redaction to Mr. Alimehmeti's Presentence Investigation Report ("PSR"). The government consents to this application.

At Mr. Alimehmeti's sentencing, counsel requested – and the Court approved – the redaction of the unproven allegations contained in paragraph 81 of the PSR. Consistent with those redactions, we respectfully request that the same allegations be redacted from the first paragraph of the "Justification" section of the PSR, and that the section be modified so that it reads as follows¹:

The defendant stands before the Court having pled guilty to one count of Providing Material Support or Resources to a Foreign Terrorist Organization and one count of False Statement in an Application for a Passport in Order to Facilitate an Act of International Terrorism. This represents the third known criminal conviction for this 24-year-old defendant. When he was 16 years of age he was convicted of a robbery, wherein he and another individual assaulted and removed property from the victim. *At the same age he was also convicted of the misdemeanor offenses of Assault in the Third Degree, Forcibly Touching and Public Lewdness. He served about a year of imprisonment on these cases and was paroled in August 2013. His parole supervision ended in August 2014, and the instant offense commenced a month later.*

Thank you for your kind consideration of this request.

Respectfully submitted,

/s/

Susan G. Kellman
Sarah Kunstler
Attorneys for Sajmir Alimehmeti

CC: AUSA Emil Bove, AUSA George Turner

¹ The proposed changes appear in italics.